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VIA ECFS

February 29, 2008

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW.  
Washington, DC 20554

Re: Annual Customer Proprietary Network Information Compliance Certification  
EB Docket No. 06-36

Dear Ms. Dortch:

Attached is the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification for Cooperative Communications, Inc.

If there are any questions regarding this certification, please contact me via email to [bobbi.vcs@comcast.net](mailto:bobbi.vcs@comcast.net) or via telephone at (205) 909-3783.

Sincerely,

*Bobbi Ferguson*

Bobbi Ferguson  
Consultant to Cooperative Communications, Inc.

Attachments

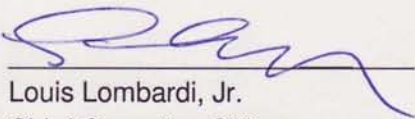
**Annual Customer Proprietary Network Information Certification**  
**Pursuant to 47 C.F.R. § 64.2009(e)**  
**EB Docket No. 06-36**  
**February 29, 2008**

I, Louis Lombardi, certify that I am an officer of Cooperative Communications, Inc. ("Cooperative") and acting as an agent of Cooperative, that I have personal knowledge that Cooperative has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how Cooperative's procedures ensure the company is in compliance with the requirements set forth in sections 64.2001 et seq. of the Commission's rules.

Cooperative has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. Cooperative has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available, regarding the processes pretexters are using to attempt to access CPNI.

Cooperative has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

  
\_\_\_\_\_  
Louis Lombardi, Jr.  
Chief Operating Officer  
Cooperative Communications, Inc.

2-28-08  
\_\_\_\_\_  
Date

**COOPERATIVE COMMUNICATIONS, INC.**  
**CPNI OPERATING PROCEDURES FOR ENSURING COMPLIANCE WITH**  
**47 U.S.C. § 222 and 47 C.F.R. §§ 64.2001- 2011**

Cooperative Communications, Inc. has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in 47 C.F.R. §§ 64.2001- 64.2011 of the Commission's CPNI rules, as modified by the Commission in 2007.

**CONFIDENTIALITY OF CARRIER INFORMATION**

A telecommunications carrier that receives or obtains proprietary information from another carrier for purposes of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for its own marketing efforts..

**COMPANY SERVICES PROVISION**

Cooperative Communications, Inc. ("the Company") is a competitive local exchange carrier, an interexchange long distance service provider, and information service provider.

**CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")**

CPNI includes information 1) that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and 2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information, which is customer information published in a telephone directory, such as customer name, address, and telephone number.

**SAFEGUARDING AGAINST PRETEXTING**

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Company will notify the FCC if it discovers any new methods of pretexting and of any actions it takes against pretexters and data brokers.

**MARKETING PROCEDURES**

The Company markets its services solely through direct sales. The Company does not use CPNI for marketing purposes and therefore does not have to maintain records regarding marketing campaigns that use its customers' CPNI.

## **UTILIZATION OF CPNI**

- (1) The Company obtains and utilizes CPNI solely for the purpose of providing interexchange and information services to its customers, billing its customers for its services, collecting payment for its services, and maintenance and repair of services. Where necessary, the Company may use, disclose or permit access to CPNI to protect its rights or property or the rights or property of its underlying carrier, to protect users of its services and other carriers from fraudulent, abusive, unlawful use of or unlawful subscription to its services.
- (2) The Company uses, discloses, or permits access to CPNI to provide or market service offerings among the interexchange and information category of service to which the Customer already subscribes.
- (3) The Company does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers or for any other purpose that is prohibited by the FCC's rules.
- (4) Without Customer approval, the Company does not use, disclose or permit access to CPNI to provide or market service offerings within a category of service that the Customer does not already subscribe in accordance with the FCC's rules.

## **CPNI DISCLOSURE TO THIRD-PARTIES**

The Company does not disclose CPNI of its current or former customers to any third-party except as required by law or regulation, or under confidentiality agreements in accordance with FCC rules, or upon customer request.

## **CUSTOMER AUTHENTICATION**

All customer information is maintained in a password protected database that can be accessed only by authorized employees such as dedicated account representatives. Authorized employees may access CPNI to address customer questions only when the person calling is listed as an "authorized contact" for the business customer. Changes to and release of information for customer account records such as address, phone numbers or services must be requested by an authorized customer contact in accordance with the provisions of the customer's contract. All such requests are verified by the Company. Although the Company has not implemented passwords, the Company will release call detail information based on customer-initiated telephone contact, if (1) a customer requests that the information be sent to the customer's address of record; or (2) the Company calls the telephone number of record and discloses the information, or (3) the customer can provide specific details of the call relevant to the customer service issue. If the customer cannot provide the relevant call detail information, the Company only provides the call detail information by calling the customer at the telephone number of record or mailing the information to the address of record. The Company does not currently provide online access to customers.

## **TRAINING AND DISCIPLINE**

The Company prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law. The Company trains its employees in the authorized use of all customer information including CPNI. Any employee that discloses confidential customer information including CPNI is subject to disciplinary action and possibly termination.

## **NOTICE OF UNAUTHORIZED DISCLOSURE OF CPNI**

As soon as practicable (and in no event more than seven (7) days) after the Company discovers that a person (without authorization or exceeding authorization) has intentionally gained access to, used or disclosed CPNI, The Company will provide electronic notification of the breach within seven business days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") via the following web site, [www.fcc.gov/eb/CPNI/](http://www.fcc.gov/eb/CPNI/). In order to allow law enforcement time to conduct an investigation, The Company will wait another seven business days before notifying the affected customers of the breach (unless the USSS and FBI request The Company to postpone disclosure). The Company may notify customers sooner if there is a risk of immediate and irreparable harm. The Company will maintain records of discovered breaches for at least two years.

## **ADDITIONAL SAFEGUARDS**

- The Company has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- The Company designates one or more officers, as an agent or agents of the Company, to sign and file a CPNI compliance certificate on an annual basis.